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ANASTASIA MARTINEZ

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ANASTASIA MARTINEZ,

Plaintiff,

v.

COUNTY OF LOS ANGELES, DANNY
BANUELOS, ALEX VILLANUEVA,
CALIFORNIA COMMERCE CLUB,
INC. and DOES 1 through 10.

Defendants.

Case No.: _22-cv-06589 DSF (AFM)

[Assigned to the Honorable Dale S.
Fischer—Courtroom 7D]

**PLAINTIFF'S AMENDED WITNESS
LIST**

Pretrial Conference:

Date: April 1, 2024
Time: 3:00 p.m.
Courtroom: 7D

Complaint Filed: October 4, 2022
Discovery Cut-Off: Dec. 15, 2023
Motion Cut-Off: Jan. 22, 2024
Trial: April 30, 2024

Plaintiff submits her Amended Initial Trial Witness List, pursuant to the requirements of Fed. R. Civ. Proc. 26(a)(3)(A), Local Rule 16-5, and Judge Fischer's Order re: Jury Trial.

Plaintiff reserves her right to add, delete, or otherwise amend the witness list as she continues her preparations for trial.

Witness	Brief Description of Testimony	Time Est.
Aguilar, Rosario	Rosario Aguilar is a sexual assault nurse at the LA/USC Medical Center who conducted the Sexual Assault Response Team exam of Plaintiff following the sexual assault by Defendant Banuelos. Defendants have designated Ms. Aguilar as a non-retained expert. Ms. Aguilar will testify regarding the findings of the examination.	Direct: 30 mins. Cross: Redirect: 10 mins.
Burson, Matthew	Matthew Burson served as the Division Chief of the Los Angeles Sheriff's Department Internal Criminal Affairs Bureau at the time of the incident. Burson will testify regarding the Los Angeles Sheriff's Department response to incidents of violence and deputy gangs occurring the in the East Los Angeles Sheriff's station, including breakdown in LASD's command structure and LASD's attempt to cover up deputy misconduct.	Direct: 20 mins. Cross: Redirect: 5 mins.
Clark, Roger	Roger Clark is Plaintiff's police practices expert. Mr. Clark will testify as to his expert opinions regarding the actions taken by Defendant Banuelos prior to and during the sexual assault of Plaintiff and regarding the practices, procedures, policies, and culture of Defendant County of Los Angeles' East Los Angeles Sheriff's	Direct: 1.5 hrs. Cross: Redirect: 45 mins.

Witness	Brief Description of Testimony	Time Est.
	Station as related to the sexual assault.	
Contreras, Mario	Mario Contreras is a deputy with the Los Angeles Sheriff's Department who worked at the East Los Angeles station. Contreras will testify regarding the influence of the Banditos in the East Los Angeles station, including the violence, intimidation, and harassment that deputies from the East Los Angeles station often engaged in.	Direct: 20 mins. Cross: Redirect: 5 mins.
Granados, Louis	Louis Granados is a deputy with the Los Angeles Sheriff's Department who previously worked at the East Los Angeles station. Granados will testify regarding the culture and practices of the East Los Angeles station, which were heavily influenced by the Banditos, including violence, illegal activity, and harassment. Granados will also testify regarding Defendant County of Los Angeles' knowledge of these practices and culture and failure to intervene.	Direct: 20 mins. Cross: Redirect: 5 mins.
Gonzalez, Alfred	Alfred Gonzalez is a deputy with the Los Angeles Sheriff's Department who previously worked at the East Los Angeles station. He will testify regarding his experience with the culture of the East Los Angeles station, including the culture lead by the Banditos of intimidation, violence, and harassment.	Direct: 30 mins. Cross: Redirect: 10 mins.
Gonzalez, Rosa	Rosa Gonzales is a sergeant with the Los Angeles Sheriff's Department. Gonzalez will testify regarding her experience of being discriminated against on the basis of gender when she worked at the East Los Angeles station and the misogynistic culture	Direct: 20 mins. Cross: Redirect: 5 mins.

Witness	Brief Description of Testimony	Time Est.
	perpetuated by the Banditos at the East Los Angeles station.	
Hanamaikai, Nikki	Nikki Hanamaikai is a sergeant with the Los Angeles Sheriff's Department and was the preliminary investigator into the sexual assault of Plaintiff by Defendant Banuelos. Sgt. Hanamaikai will testify regarding the investigation into the subject incident conducted by Defendant County of Los Angeles immediately following the incident, including his contact with Plaintiff immediately following the incident.	Direct: 45 mins. Cross: Redirect: 15 mins.
Harper, Daniel	Daniel Harper is a supervising security officer with the Commerce Hotel and Casino. Mr. Harper will testify regarding his observations of Plaintiff prior to the sexual assault, including his observation that Plaintiff appeared to be intoxicated. Mr. Harper will also testify regarding his contact with Defendant Banuelos immediately prior to Defendant Banuelos sexually assaulting Plaintiff, where Defendant Banuelos contacted Mr. Harper and told him that Plaintiff requested information regarding a restraining order. Mr. Harper offered to accompany Defendant Banuelos to Plaintiff's hotel room, but Defendant Banuelos refused and went to Plaintiff's hotel room alone.	Direct: 30 mins. Cross: Redirect: 10 mins.
Huntsman, Max	Max Huntsman is the Inspector General of the County of Los Angeles. Huntsman will testify regarding the culture of the East Los Angeles Sheriff's station and LASD's refusal to take steps to correct the culture and obstruction of outside investigation to the issue of deputy gangs or cliques and incidents of violence at the	Direct: 30 mins. Cross: Redirect: 10 mins.

Witness	Brief Description of Testimony	Time Est.
	station.	
Jara, Liliana	Liliana Jara is a sergeant with the Los Angeles Sheriff's Department and led the Internal Criminal Investigations Bureau Professional Standards Division investigation into the sexual assault of Plaintiff by Defendant Banuelos and authored the 1,600+ page report regarding the investigation. Sgt. Jara will testify regarding the investigation, the findings of the investigation, Defendant County of Los Angeles' response in regard to Defendant Banuelos following the investigation, and Defendant County of Los Angeles' refusal to provide Plaintiff with the name of Defendant Banuelos.	Direct: 45 mins. Cross: Redirect: 15 mins.
Kennedy, Sean	Sean Kennedy is the Commission Chair of the Civilian Oversight Commission. Kennedy will testify regarding the culture created by the Banditos deputy gang in the East Los Angeles station. The Banditos coerce female trainees into having sex with them and retaliate against those who do not and often engage in acts of violence.	Direct: 30 mins. Cross: Redirect: 10 mins.
Ladjevic, Virginia	Virginia Ladjevic is a sergeant with the Los Angeles Sheriff's Department and is one of Defendant County of Los Angeles' rule 30(b)(6) designees. Sgt. Ladjevic will testify regarding Defendant County of Los Angeles' process for investigating and resolving complaints of sexual harassment.	Direct: 30 mins. Cross: Redirect: 10 mins.
Lemus, Ariela	Ariela Lemus was a deputy with the Los Angeles Sheriff's Department who previously worked out of the East Los Angeles station. Lemus will	

Witness	Brief Description of Testimony	Time Est.
	testify regarding the culture and practices of the East Los Angeles station, which are heavily influenced by the Banditos. This includes deputies engaging in acts of violence, intimidation, and dishonesty.	
Levine, David	David Levine was a security officer with the Commerce Hotel and Casino at the time of the subject incident. Mr. Levine will testify that immediately prior to Defendant Banuelos' sexual assault of Plaintiff, he offered three times to Defendant Banuelos to bring Plaintiff down from her room to speak with him but Defendant Banuelos refused and proceeded to Plaintiff's hotel room alone. Mr. Levine will also testify regarding his observations of Plaintiff immediately prior to the sexual assault, including that Plaintiff was noticeably intoxicated.	Direct: 30 mins. Cross: Redirect: 10 mins.
Lujan, Eileen	Eileen Lujan is a sexual assault nurse at the LA/USC Medical Center who conducted the Sexual Assault Response Team exam of Plaintiff following the sexual assault by Defendant Banuelos. Defendants have designated Ms. Lujan as a non-retained expert. Ms. Lujan will testify regarding the findings of the examination.	Direct: 30 mins. Cross: Redirect: 10 mins.
Magana, Jaime	Jaime Magana is a sergeant with the Los Angeles Sheriff's Department and is one of Defendant County of Los Angeles' rule 30(b)(6) designees. Sgt. Magana will testify regarding training regarding sexual harassment, honesty, courtesy, and self-identification provided to Defendant Banuelos by Defendant County of Los Angeles.	Direct: 30 mins. Cross: Redirect: 10 mins.

Witness	Brief Description of Testimony	Time Est.
Martinez, Anastasia (Plaintiff)	<p>Plaintiff will testify about the sexual assault by Defendant Banuelos, including her alcohol consumption prior to the incident, her interactions with Defendant Banuelos when he responded to her 911 call, Defendant Banuelos' communications with her, the subject incident, and her actions after the incident.</p> <p>Plaintiff will also testify about her damages resulting from the sexual assault by Defendant Banuelos, including the psychological and emotional distress she has suffered as a result of the sexual assault and the impact that the sexual assault has had on her life and functioning.</p>	<p>Direct: 2 hrs.</p> <p>Cross:</p> <p>Redirect: 1 hr.</p>
Martinez, Julie	<p>Julie Martinez is Plaintiff Anastasia Martinez's mother. Ms. Martinez will testify regarding reporting Defendant Banuelos' sexual assault of Plaintiff to Defendant County of Los Angeles.</p> <p>Ms. Martinez will also testify about Plaintiff's damages, including the emotional distress Plaintiff suffered immediately following the sexual assault and the long-term psychological impact she has witnessed Plaintiff experience as a result of the sexual assault. Ms. Martinez will testify regarding Plaintiff's damages from a different perspective than Plaintiff. As her mother, Ms. Martinez has known Plaintiff her entire life and therefore is well positioned to testify about the changes she has witnessed in Plaintiff as a result of the sexual assault.</p>	<p>Direct: 45 mins.</p> <p>Cross:</p> <p>Redirect: 15 mins.</p>
Mechanic, Mindy	Dr. Mindy Mechanic is Plaintiff's	Direct: 45

Witness	Brief Description of Testimony	Time Est.
	rebuttal forensic psychology expert. In the event that Defendants' forensic psychology expert Dr. Adrienne Meier testifies, Dr. Mechanic will rebut Dr. Meier's testimony by testifying about the methodology Dr. Meier used to develop her opinions.	mins. Cross: Redirect: 15 mins.
Mejia, Ricardo	Ricardo Mejia is a friend of Plaintiff who spoke with Plaintiff on the phone immediately prior to Defendant Banuelos' sexual assault of Plaintiff. Mr. Mejia will testify regarding Plaintiff's reaction to Defendant Banuelos contacting her and Plaintiff's state of mind prior to the sexual assault.	Direct: 30 mins. Cross: Redirect: 10 mins.
Olmos, Luis	Luis Olmos is a senior criminalist with the Los Angeles County Sheriff's Department. Defendants have designated Mr. Olmos as a non-retained expert. Mr. Olmos will testify regarding the DNA evidence analysis he conducted of DNA evidence collected from the scene of Defendant Banuelos' sexual assault of Plaintiff.	Direct: 20 mins. Cross: Redirect: 5 mins.
Omstead, Robert	Robert Olmstead was the Assistant Sheriff with the Los Angeles Sheriff's Department at the time of the incident. Olmstead will testify regarding LASD's knowledge of the existence of the Banditos deputy gang in the East Los Angeles station and LASD's lack of intervention or investigation into the impact of the Banditos in the East Los Angeles station.	Direct: 20 mins. Cross: Redirect: 5 mins.
Rivas, Mike	Mike Rivas was a detective with the Los Angeles Sheriff's Department's high tech task force. Defendants have designated Mr. Rivas as a non-retained expert. Mr. Rivas will testify	Direct: 15 mins. Cross:

Witness	Brief Description of Testimony	Time Est.
	regarding the forensic examination he conducted of Defendant Banuelos' two cell phones including the data he extracted from the phones regarding Defendant Banuelos' communications and attempts to communicate with Plaintiff and Defendant Banuelos' post-assault activity.	Redirect: 5 mins.
Sandberg, Michelle	Michelle Sandberg is a senior criminalist with the Los Angeles County Sheriff's Department. Defendants have designated Ms. Sandberg as a non-retained expert. Ms. Sandberg will testify regarding the results of the laboratory drug tests she conducted on Plaintiff following the sexual assault by Defendant Banuelos.	Direct: 10 mins. Cross:
Neal, Somavedey	Somavedey Neal is a senior criminalist with the Los Angeles County Sheriff's Department. Defendants have designated Ms. Somavedey as a non-retained expert. Ms. Somavedey will testify regarding the results of the laboratory tests regarding Plaintiff's Blood Alcohol Concentration she conducted on Plaintiff following the sexual assault by Defendant Banuelos.	Direct: 10 mins. Cross:
Tardy, April	April Tardy was the Chief of the Los Angeles Sheriff's Department's Central Patrol Division at the time of the subject incident. Ms. Tardy will testify regarding her request for an investigation into the sexual assault of Plaintiff by Defendant Banuelos and the Defendant County of Los Angeles' investigation into and response to the sexual assault.	Direct: 30 mins. Cross: Redirect: 10 mins.
Zaredini, Benjamin	Benjamin Zaredini is a deputy with the	Direct: 20

Witness	Brief Description of Testimony	Time Est.
	Los Angeles Sheriff's Department. Zaredini will testify regarding the culture and practices of the East Los Angeles Sheriff's station, including the LASD's knowledge of the Banditos, misconduct occurring at the East Los Angeles station, and breakdown in the command structure and discipline.	mins. Cross: Redirect: 5 mins.

Dated: March 14, 2024

Respectfully Submitted,

HADSELL STORMER RENICK & DAI LLP

By: /s/ Rebecca Brown
 Dan Stormer
 Hanna Chandoo
 Rebecca Brown
 Attorneys for Plaintiff
 ANASTASIA MARTINEZ